



New Hope Telephone Cooperative
Main Office Number - 2567234211

Robocall Mitigation Plan

NHTC is eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2)) that has non-IP portions within its network §64.6304(d). NHTC provides local service to fewer than 100,000 voice subscriber lines.

Consistent with § 64.6303 (a)(1), NHTC is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. However, NHTC's non-IP network is connected to carriers that do not support IP connectivity; therefore, NHTC cannot upgrade those non-IP portions of its network to IP connectivity.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), **NHTC** is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as NHTC's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

The NHTC network also has IP-portions which originates calls via SIP connections to other carriers. NHTC has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. NHTC has implemented STIR|SHAKEN within the IP portions of its network and Sinch signs the calls originating on the IP portions of its network with the NHTC certificate.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

In addition, NHTC has procedures in place to prevent new & renewing customers from using our network to originate illegal robocalls. NHTC thoroughly vets new residential and business customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Residential customers are asked to provide their full name, address (physical and mailing, if different), last four digits of their social security number, date of birth, phone number, email, and establish a security question, and a password. NHTC also requires a photo ID for all new customers requesting voice service.

Business customers are asked to provide their full name, address (physical and mailing, if different), tax identification number, phone number, email, and establish a security question, and a password. To initiate an account change, a customer must provide their password or the answer to their security question prior to initiating a change. If the customer is unable to provide that information the customer service representative will call the customer back using the number they provided at account setup.

Upstream Provider Knowledge

NHTC knows all the carriers from which it receives traffic and has confirmed that all of the carriers are listed in the Robocall Mitigation Database. NHTC monitors incoming traffic from all connected carriers for suspicious call patterns indicative of illegal robocall activity, notifies the upstream carriers of any such traffic and warns the carriers that if the traffic does not cease, the calls may be blocked from entering NHTC's network. In addition, NHTC is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Traceback

NHTC commits to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

Call Analytics

NHTC uses Sinch for STIR/Shaken and call analytics to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

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